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12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

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15 JANA LEIGH THOMAS-ORTEGA,
16 Plaintiff,

17 v.

18 KILOLO KIJAKAZI,
19 Acting Commissioner of Social Security,
Defendant.

No. 1:23-cv-00715-BAM

STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT

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23 IT IS HEREBY STIPULATED by and between the parties, through their respective
24 undersigned attorneys, and subject to this Court's approval, that Defendant's time to respond to
25 Plaintiff's Complaint be extended thirty (30) days from July 10, 2023, to August 9, 2023. This is
26 the first extension request of the parties. Counsel apologizes to the Court for any inconvenience
27 caused by this delay and sets forth good cause in the attached Declaration. All other dates in the
28

1 Court's Scheduling Order shall be extended accordingly.

2 Respectfully submitted July 7, 2023.

3 Law Offices of Francesco Benavides

4 By: */s/ Francesco Benavides*
5 FRANCESCO P. BENAVIDES
6 Attorney for Plaintiff
(*as authorized by email)

7 PHILLIP A. TALBERT
8 United States Attorney

9 By: *s/ Oscar Gonzalez de Llano*
10 OSCAR GONZALEZ DE LLANO
11 Special Assistant United States Attorney

12 Attorneys for Defendant

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ORDER

Pursuant to Defendant's Stipulation and good cause appearing, Plaintiff shall have an extension, up to and including August 9, 2023, to file a response to Plaintiff's Complaint.

IT IS SO ORDERED.

Dated: July 10, 2023

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE